

Permitting Meeting Gunnison Copper Project

March 9, 2017

ED_001697_00006947-00001

Comment 37



Comparison of Step Rate Test vs Intercept Method

Discussion



- The Step Rate Test Procedure
 - Designed for completed wells, with casing grouted in and perforated
 - Tests the entire well and all the perforations.
 - Not applied in open holes
 - Best results are obtained in hydraulically conductive intervals, not tight nonproductive intervals



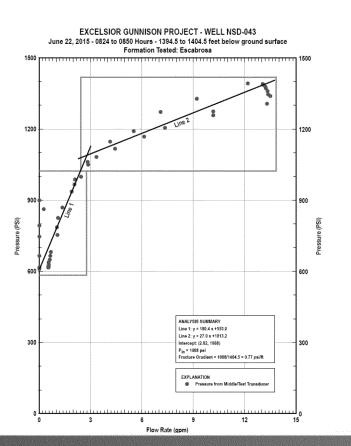
- The Intercept Method
 - Applied in open holes and at selected intervals
 - Applied in conjunction with straddle packers to isolate specific intervals.
 - Specific intervals required due to borehole conditions (minimum borehole diameter requirements).
 - And hydrogeologic limitations

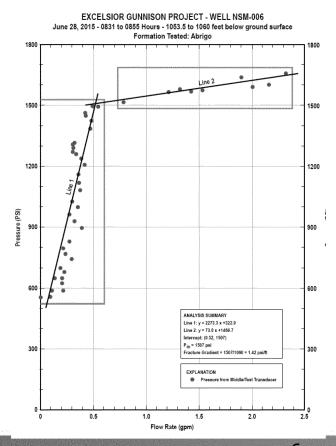
Excelsion

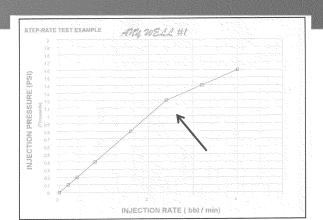
- In both cases, Pressure, Flow (volume and flow rate) and time are recorded.
- Flow and pressure are increased until the rock yields to the stress and "fractures".
- The pressure at which the fracture occurs is used to estimate the fracture gradient.
- However, for the fractured, hydrogeologically heterogeneous environment at Gunnison, the Intercept Method is more appropriate.

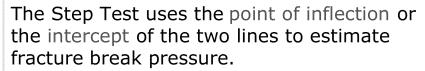
Intercept Method Data Sets







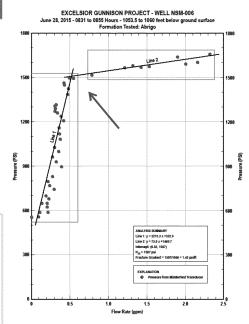




The intercept method does the same thing.

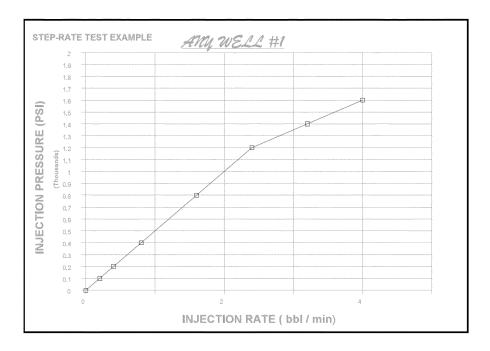
The difference is the amount of time spent to gather each data point.

However, the result is the same.



Step Rate Test





From EPA Guidance



Table A - Formation Fracture Pressure Gradient, Excelsior Gunnison Copper Project (Peak Pressure Method)

		Bor	Formation (psi/foot)											
Borehole	Borehole Diameter (inches)	Test Date	Test Number	Test Interval Depth (ft bis)	Bit Depth (ft bls)	Estimated Fracture Pressure (psi)	•	Escabrosa	Martin	Upper Abrigo	Middle Abrigo	Lower Abrigo	Overall Wel Average	
		21-Jun-15	1b	1,504.5	1,485.5	1,925			1.28					
NSD-043		22-Jun-15	2	1,445.0	1,426.0	2,000			1.38					
	4	22-Jun-15	3a	1,404.5	1,385.6	1,380		0.98					1	
	4	22-Jun-15	3b	1,405.5	1,386.6	1,305		0.93					1.38	
		22-Jun-15	4	1,170.0	1,154.5	2,325		1.99						
		23-Jun-15	5	996.5	981.0	1,695	1.70							
NSM-008	4.75	24-Jun-15	1	1,239.5	1,224.0	2,485						2.00	1.79	
		24-Jun-15	2	1,054.6	1,039.0	1,585					1.50			
		24-Jun-15	3	1,010.0	994.5	1,800				1.	78			
		24-Jun-15	4	986.5	971.0	1,865				1.89				
		25-Jun-15	5	901.7	886.0	1,580				1.75				
	5.15	26-Jun-15	2	1,276.7	1,261.0	2,010					1.57			
NSM-009		27-Jun-15	3	1,102.0	1,086.5	1,585					Test		1.62	
		27-Jun-15	4	942.0	926.5	1,560				1.	66			
	3.75	28-Jun-15	1	1,060.0	1,044.6	1,580					1.49	,		
		28-Jun-15	2	937.0	921.5	1,460					1.56		1.75	
NSM-006		28-Jun-15	3	921.0	905.5	1,620	ļ				76			
		29-Jun-15	4	798.0	782.5	1,580			***************************************	1.98				
		29-Jun-15 29-Jun-15	5	782.6 766.0	767.0 750.5	1,485				1.90 1.80			l	
		29-Jun-15 30-Jun-15	1	1,070.0	1,054.5	1,380 1,790			1.67	1.80				
		30-Jun-15 30-Jun-15	2	1,070.0	1,034.5	1,790	 	-	1.50		 		1	
	3.75	30-Jun-15	3	823.7	808.0	1,355			1.65				1	
NSM-007		30-Jun-15	4	781.5	766.0	1,180			1.51				1.53	
		30-Jun-15	5	734.0	718.5	1,110			1.51					
		30-Jun-15	6	660.7	645.0	885			1.34				1	
***************************************		2-Jul-15	1	747.0	-	1,660					2.22			
NSD-037	3.75	2-Jul-15	2	726.7	-	1,370			1.89				1.95	
		2-Jul-15	3	705.0	-	1,225			1.74				1	

Formation Average Fracture Gradient

Number of Tests per Formation

bls = below land surface

Notes:

1.70

3

10

8

1.75 1

1.67

psi = pounds per square inch formation fracture pressure gradient - estimated breakthrough pressure / depth of bottom of packed interval in ft bls



Table B - Formation Fracture Pressure Gradient, Excelsior Gunnison Copper Project (Q vs P Intercept Method)

Borehole Information								Formation (psi/foot)								
Borehole	Borehole Diameter (inches)	Test Date	Test Number	Test Interval Depth (ft bis)	Bit Depth (ft bls)	Estimated Fracture Pressure (psi)	Horquilla	Escabrosa	Martin	Upper Abrigo	Middle Abrigo	Lower Abrigo	Overal Well Averag			
	4	21-Jun-15	1b	1,504.5	1,485.5	1,563			1.04				1.21			
		22-Jun-15	2	1,445.0	1,426.0	1,712			1.18							
NSD-043		22-Jun-15	3a	1,404.5	1,385.6	1,090		0.78								
	4	22-Jun-15	3b	1,405.5	1,386.6	1,310		0.93								
		22-Jun-15	4	1,170.0	1,154.5	2,199		1.88								
		23-Jun-15	5	996.5	981.0	1,454	1.46									
NSM-008	4.75	24-Jun-15	1	1,239.5	1,224.0	1,197						0.97	1.52			
		24-Jun-15	2	1,054.6	1,039.0	1,563					1.48					
		24-Jun-15	3	1,010.0	994.5	1,705				1.	69					
		24-Jun-15	4	986.5	971.0	1,791				1.82						
		25-Jun-15	5	901.7	886.0	1,488				1.65						
	5.15	26-Jun-15	2	1,276.7	1,261.0	1,963					1.54					
NSM-009		27-Jun-15	3	1,102.0	1,086.5	1,585					Test		1.60			
		27-Jun-15	4	942.0	926.5	1,565				1.	<u> </u>					
	3.75	28-Jun-15	1	1,060.0	1,044.6	1,507			,		1.42					
		28-Jun-15	2	937.0	921.5	1,546					1.65		1.71			
NSM-006		28-Jun-15	3	921.0	905.5	1,558				1.	69					
15111 000		29-Jun-15	4	798.0	782.5	1,516				1.90						
		29-Jun-15	5	782.6	767.0	1,425				1.82						
		29-Jun-15	6	766.0	750,5	1,360				1.78						
	3.75	30-Jun-15	1	1,070.0	1,054.5	1,752			1.64				l			
		30-Jun-15	2	1,039.7	1,024.0	1,492			1.43				l			
NSM-007		30-Jun-15	3	823.7	808.0	1,337			1.62				1.46			
		30-Jun-15	4	781.5	766.0	1,134			1.45				1 21.10			
		30-Jun-15	5	734.0	718.5	1,093			1.49				Į			
		30-Jun-15	6	660.7	645.0	757			1.15				<u> </u>			
		2-Jul-15	1	747.0	-	1,590					2.13		I			
NSD-037	3.75	2-Jul-15	2	726.7	-	1,353			1.86				1.78			
		2-Jul-15	3	705.0	-	944	I		1.34							

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Formation Average Fracture Gradient Number of Tests per Formation

Notes:

ft - feet bls = below land surface

psi = pounds per square inch formation fracture pressure gradient - estimated breakthrough pressure / depth of bottom of packed interval in ft bls

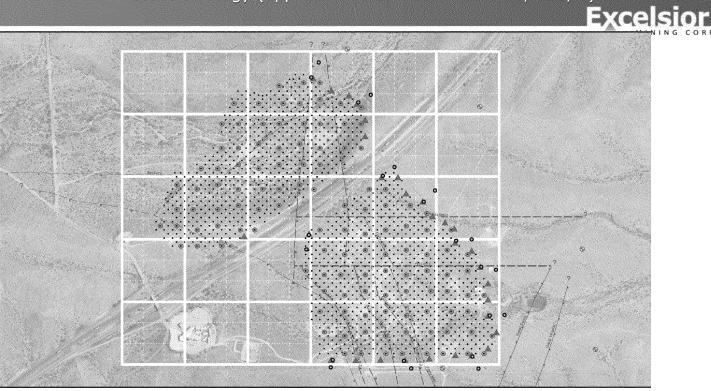
Revised Closure Strategy

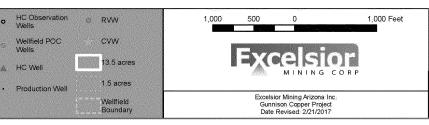


Relevant to

- Comment 12b
- Comment 15
- Comment 20
- Comment 63—post closure monitoring

Revised Closure Strategy (applicable to EPA comments 20, 12b, 6)



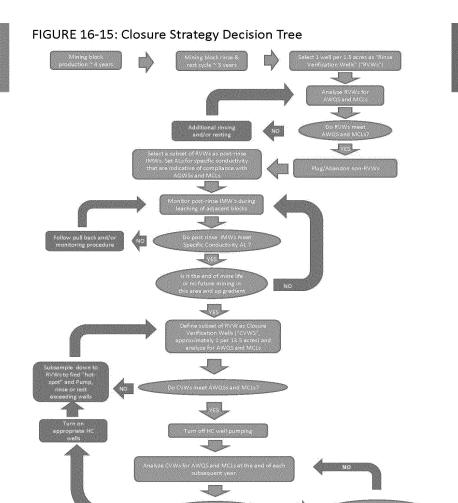




Coordinate System: NAD 1983 StatePlane Arizona East FIPS 0201 Feet

Figure 16-16: **CLOSURE AND POST-CLOSURE** MONITORING LOCATIONS

ED_001697_00006947-00012





Decision tree—closure strategy

13

Comment 58—7520-14 forms

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			PLU	IGGIN	IG AN				ENT PL						
EXCEL.	d Address of Fa SIOR MININ ISON PROJEC	G CORP				Name and Address of Owner/Operator EXCELSIOR MINING CORP CONCORD PL, 2999 N 44TH ST, STE 300, PHOENIX, A									
Loca	ate Well and Or	diina linit on							unty			Permit Number			
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A										Hydraulic Control Wells					
					Lease Nar			-							
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									Land Con-						
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These are generic forms. Do we really need to sign them?

We will be submitting completed forms prior to P&A

Comment 3: Exempt top 200' sulfide zone



- Excelsior will add proposal to include upper 200 feet of sulfide zone.
- Basis for exemption? Possible fault connections with oxide zone.
- While the hydraulic conductivity in the sulfide zone is low, as
 demonstrated by two aquifer tests, EPA's concern is that the absence of a
 confining layer between the oxide and sulfide zones will result in an
 exchange or mixing of aquifer fluids between the oxide and sulfide zones
 during ISR operations. EPA says this is most likely to occur where injection
 and recovery wells are situated near a fault zone and the oxide-sulfide
 interface.

CRAI 2 Methdology for ALs for Specific conductance



 ALs for outer ring of IMWs will indicate when to turn on HC wells or initiate pumpback.

Per ADEQ request, Excelsior will:

- propose ambient monitoring of specific conductance
- Contingency language for adjusting operations, installing HC wells (if not already installed) and adjusting of HC pumping.



END